

1 DAVID M. McLAUGHLIN (SBN 131973)  
2 SPIROS E FOUSEKIS (SBN 260387)  
3 DANIEL E. GAITAN (SBN 326413)  
4 ROPERS, MAJESKI, KOHN & BENTLEY  
5 1001 Marshall Street, Suite 500  
6 Redwood City, CA 94063-2052  
7 Telephone: (650) 364-8200  
8 Facsimile: (650) 780-1701  
9 Email: [david.mclaughlin@rmkb.com](mailto:david.mclaughlin@rmkb.com)  
10 [spiros.fousekis@rmkb.com](mailto:spiros.fousekis@rmkb.com)  
11 [daniel.gaitan@ropers.com](mailto:daniel.gaitan@ropers.com)

12 Attorneys for Defendants  
13 HUDSON SKYPORT PLAZA, LLC, a Delaware  
14 limited liability company, HUDSON SKYPORT  
15 PLAZA LAND, LLC, a Delaware limited liability  
16 company, HUDSON PACIFIC PROPERTIES, INC.,  
17 a Maryland corporation

18 ROBERT KOPELSON (SBN 83523)  
19 LAW OFFICE OF ROBERT B. KOPELSON  
20 75 E. Santa Clara Street, Suite 1180  
21 San Jose, CA 95113  
22 Telephone: (408) 293-4000  
23 Facsimile: (408) 293-8369  
24 Email: [kopelaw@hotmail.com](mailto:kopelaw@hotmail.com)

25 STEVEN L. DERBY (SBN 148372)  
26 ANTHONY E. GOLDSMITH (SBN 125621)  
27 CELIA MCGUINNESS (SBN 159420)  
28 DERBY McGUINNESS & GOLDSMITH LLP  
29 200 Lakeside Drive, Suite A  
30 Oakland, CA 94612  
31 Telephone: (510) 987-8778  
32 Facsimile: (510) 359-4419  
33 Email: [info@dmglawfirm.com](mailto:info@dmglawfirm.com)

34 **Attorneys for Plaintiff**  
35 CRISTINA MENDOZA

36 UNITED STATES DISTRICT COURT  
37 NORTHERN DISTRICT OF CALIFORNIA  
38 SAN JOSE DIVISION

39 CRISTINA MENDOZA,

40 Plaintiff,

41 CASE NO. 5:17-cv-03579-SVK

1  
2 v.

3 CITY OF SAN JOSE, PACIFIC GAS &  
4 ELECTRIC COMPANY, a California  
5 registered domestic stock corporation,  
6 HUDSON SKYPORT PLAZA, LLC, a  
7 Delaware limited liability company,  
8 HUDSON SKYPORT PLAZA LAND,  
9 LLC, a Delaware limited liability company,  
10 HUDSON PACIFIC PROPERTIES, INC.,  
11 a Maryland corporation, SPIEKER  
12 PROPERTIES LP, a California limited  
13 partnership, EOP OPERATING LIMITED  
14 PARTNERSHIP, LP, a Delaware limited  
15 partnership, CA – SKYPORT I LIMITED  
16 PARTNERSHIP, a Delaware limited  
17 partnership, and DOES 1-100, Inclusive,

18 Defendant.

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**JOINT STIPULATION TO EXTEND  
DEADLINES TO RESPOND AND REPLY  
TO PLAINTIFF'S MOTION TO AMEND  
THE COMPLAINT [ECF 76] AND THE  
HEARING DATE [AND ~~PROPOSED~~  
ORDER]**

29 Plaintiff, CRISTINA MENDOZA (Plaintiff) and Defendants, HUDSON SKYPORT  
30 PLAZA, LLC, a Delaware limited liability company, HUDSON SKYPORT PLAZA LAND,  
31 LLC, a Delaware limited liability company, HUDSON PACIFIC PROPERTIES, INC., a  
32 Maryland corporation (HUDSON Defendants), hereby jointly stipulate and request through their  
33 attorneys of record the following:

34 WHEREAS, the parties have met and conferred regarding: (1) extending the time for  
35 HUDSON Defendant's Response and Plaintiff's Reply to Plaintiff's Motion to Amend the  
36 Complaint [ECF 76] and (2) extending the hearing date, the parties have reached the following  
37 agreement and hereby STIPULATE as follows.

- 38 1. Plaintiff and defendants have been working to reach a version of a First Amended  
39 Complaint to which the parties can stipulate. Plaintiff has sent the HUDSON  
40 Defendants counsel three drafts of the proposed First Amended Complaint. The  
41 Parties desire to continue to meet and confer regarding the form and content of the  
42 First Amended Complaint. The Parties hereby stipulate and respectfully request that  
43 the deadline for HUDSON Defendant's Response, be extended from March 16, 2020,  
44 to March 23, 2020, and the deadline for Plaintiff's Reply be extended from March 23,  
45 2020, to March 30, 2020.

2. As result of the deadline to Respond and Reply being extended, and the fact that additional defendants may need to respond to a First Amended Complaint, the parties stipulate to and hereby respectfully request that the Court also extend the hearing date from April 7, 2020, to April 14, 2020.

## IT IS SO STIPULATED.

Dated: March 16, 2020

## ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ *David M. McLaughlin*  
DAVID M. McLAUGHLIN  
SPIROS E FOUSEKIS  
DANIEL E. GAITAN  
Attorneys for Defendants  
HUDSON SKYPORT PLAZA, LLC, a  
Delaware limited liability company,  
HUDSON SKYPORT PLAZA LAND,  
LLC, a Delaware limited liability company,  
HUDSON PACIFIC PROPERTIES, INC.,  
a Maryland corporation

Dated: March 16, 2020

DERBY, MCGUINNESS & GOLDSMITH,  
LLP

By: /s/ Anthony Goldsmith  
ANTHONY GOLDSMITH  
Attorneys for Plaintiff  
CRISTINA MENDOZA

Dated: March 16, 2020

## LAW OFFICE OF ROBERT B. KOPELSON

By: ROBERT B. KOPELSON  
Attorney for Plaintiff  
CRISTINA MENDOZA

1 stipulate to and hereby respectfully request that the Court also extend the hearing date  
2 from April 7, 2020, to April 14, 2020.

3 **IT IS SO STIPULATED.**

4 Dated: March 16, 2020

5 ROPERS, MAJESKI, KOHN & BENTLEY

6 By:

7 DAVID M. McLAUGHLIN  
8 SPIROS E FOUSEKIS  
9 DANIEL E. GAITAN  
10 Attorneys for Defendants  
11 HUDSON SKYPORT PLAZA, LLC, a  
12 Delaware limited liability company,  
13 HUDSON SKYPORT PLAZA LAND,  
14 LLC, a Delaware limited liability company,  
15 HUDSON PACIFIC PROPERTIES, INC.,  
16 a Maryland corporation

17 Dated: March 16, 2020

18 DERBY, McGUINNESS & GOLDSMITH,  
19 LLP

20 By:

21 ANTHONY GOLDSMITH  
22 Attorneys for Plaintiff  
23 CRISTINA MENDOZA

24 Dated: March 16, 2020

25 LAW OFFICE OF ROBERT B. KOPELSON

26 By:

27 ROBERT B. KOPELSON  
28 Attorney for Plaintiff  
CRISTINA MENDOZA

## **[PROPOSED] ORDER**

For GOOD CAUSE shown and for the reasons set forth above, the below deadlines are amended as follows:

4 Last day for Hudson Defendant's Response to ECF 76: March 23, 2020; Last day for  
5 Plaintiff's Reply to ECF 76: March 30, 2020; ~~and Hearing date extended to: April 14,~~  
6 **2020. The Court will determine if a hearing is needed once briefing has concluded.**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 16, 2020

Susan van Kuel

Hon. Susan van Keulen  
UNITED STATES MAGISTRATE JUDGE

## FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1, I hereby attest that I, David M. McLaughlin, an attorney with Ropers, Majeski, Kohn & Bentley, received the concurrences of counsel in the filing of this document.

Dated: March 16, 2020

## ROPERS, MAJESKI, KOHN & BENTLEY

By: /s/ David M. McLaughlin  
DAVID M. McLAUGHLIN  
SPIROS E FOUSEKIS  
DANIEL E. GAITAN  
Attorneys for Defendants  
HUDSON SKYPORT PLAZA, LLC, a  
Delaware limited liability company,  
HUDSON SKYPORT PLAZA LAND,  
LLC, a Delaware limited liability company,  
HUDSON PACIFIC PROPERTIES, INC.,  
a Maryland corporation